

FILED 27 APR '11 16:44 USDC-ORP

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

v.

**JOAQUIN SEGURA-CORDERO,
also known as "Doriro",
also known as Jose Manuel Perez Rodriguez,**

Defendant.

) No. CR 11- 168 - HA

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) **INDICTMENT**

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) 21 U.S.C. § 841(a)(1), (b)(1)(A)(i)

) 21 U.S.C. § 841(a)(1), (b)(1)(C)

) 21 U.S.C. § 846

) 21 U.S.C. § 841(a)(1), (b)(1)(B)(i)

) 18 U.S.C. § 2

) 21 U.S.C. § 853

)

) **UNDER SEAL**

UNDER SEAL

THE GRAND JURY CHARGES THAT:

COUNT 1 (DRUG CONSPIRACY)

Beginning on a date unknown to the Grand Jury and continuing up to April 12, 2011, in the District of Oregon, **JOAQUIN SEGURA-CORDERO**, defendant herein, did knowingly and intentionally conspire and agree with other persons, both known and unknown to the Grand Jury, to knowingly and intentionally distribute heroin, a Schedule I controlled substance, in a quantity of one kilogram or more in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i) and 846.

WAYS AND MEANS OF CONSPIRACY

It was a part of this conspiracy that the above-named defendant and his co-conspirators would and did obtain, maintain, and use vehicles to hide heroin and to travel within the District of Oregon to facilitate the distribution of heroin.

It was a part of this conspiracy that the above-named defendant and his co-conspirators would and did obtain, maintain, and use phones to facilitate the distribution of heroin.

It was part of the conspiracy that the above-named defendant and his co-conspirators would and did obtain, maintain, and use premises in the District of Oregon to facilitate the distribution of heroin.

It was a part of this conspiracy that the above-named defendant and his co-conspirators would and did transport, transfer, and conceal money in the District of Oregon to pay expenses related to the distribution of heroin.

COUNT 2 (DISTRIBUTION OF HEROIN RESULTING IN DEATH)

On or about January 19, 2011 to January 24, 2011, in the District of Oregon, **JOAQUIN SEGURA-CORDERO**, defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and that defendant's distribution of said heroin resulted in the death of another person, to wit: defendant distributed heroin which was ultimately used by Jedidiah Elliot, whose use of said heroin resulted in his death, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 3 (DISTRIBUTION OF HEROIN RESULTING IN DEATH)

On or about March 30, 2011 to April 1, 2011, in the District of Oregon, **JOAQUIN SEGURA-CORDERO**, defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and that defendant's distribution of said heroin resulted in the death of another person, to wit: defendant distributed heroin which was ultimately used by Tovi Sinyayev, whose use of said heroin resulted in his death, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 4 (POSSESSION WITH INTENT TO DISTRIBUTE HEROIN)

On or about January 7, 2011, in the District of Oregon, **JOAQUIN SEGURA-CORDERO**, defendant herein, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in a quantity of 100 grams or more, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(i).

COUNT 5 (DISTRIBUTION OF HEROIN)

On or about February 24, 2011, in the District of Oregon, **JOAQUIN SEGURA-CORDERO**, defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 6 (DISTRIBUTION OF HEROIN)

On or about March 11, 2011, in the District of Oregon, **JOAQUIN SEGURA-CORDERO**, defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 7 (DISTRIBUTION OF HEROIN)

On or about March 23, 2011, in the District of Oregon, **JOAQUIN SEGURA-CORDERO**, defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 8 (POSSESSION WITH INTENT TO DISTRIBUTE HEROIN)

On or about April 12, 2011, in the District of Oregon, **JOAQUIN SEGURA-CORDERO**, defendant herein, did knowingly and intentionally possess with the intent to

distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in a quantity of 100 grams or more, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(i).

CRIMINAL FORFEITURE ALLEGATION

Upon conviction of one or more of the controlled substance offenses alleged herein, **JOAQUIN SEGURA-CORDERO**, defendant herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation.

Dated this 27 day of April 2011.

A TRUE BILL.

~~FOREPERSON~~

Presented by:

DWIGHT C. HOLTON
United States Attorney


KATHLEEN L. BICKERS
Assistant United States Attorney


LEAH K. BOLSTAD
Assistant United States Attorney


STEVEN MYGRANT
Special Assistant United States Attorney